

### **REMARKS/ARGUMENTS**

Claims 1-22 are pending. New claim 22 is claim 2, rewritten in independent form to put it in form for allowance. Claims 1 and 17 have been amended.

1. **Priority**

Applicant has amended the specification to clarify that it is a continuation of prior Application No. PCT/BE02/00067, filed on May 2, 2002, and claims the foreign priority of Belgian Patent Application No. 010307, filed May 3, 2001. Applicant claimed the benefit of these earlier applications in both its declaration and the application transmittal letter, submitted at the time the application was filed. Thus, applicant submits that the petition and surcharge are not required.

Applicant plans to submit a certified copy of the Belgium Patent Application No. 010307 at a later date.

2. **Information Disclosure Statement**

Concerning Belgian patent 847088, a concise explanation of its relevance is provided at page 1, lines 17 to 23 of the present patent application. Applicant submits a Supplemental Information Disclosure Statement so the Examiner can consider the information therein.

3. **Claim objection**

Claim 17 has been amended to correct the informality.

4. U.S. Patent 3,373,873 (Parmentier) does not anticipate claims 1, 6, 8, 17-19.

U.S. Patent No. 3,373,873 (Parmentier) concerns a continuous fluid filtration device comprising cells which are disposed in a carousel and are able to pivot about a tilt axis (16) tangential to a horizontal circle.

In some embodiments the means for discharging the filtrate are outlets at the bottom of each cell (see for example Fig. 2). These outlets are connected by means of pipes 36 to a rigid “collector” 66 joined to the tilting bottom. As Parmentier explains, col. 6, l. 69 to col. 7, l. 10, there is one collector 66 by cell and this collector is a pipe which tilts with the bottom and is consequently not central. In the tilted position of Fig. 2, the collector 66 is not illustrated, but is in fact separated from the pipe 71. In the filtration position, the collector 66 is fitted with a flange 67 which is applied against an airtight joint 68. In this position only there is a communication between the bottom of the cell and a “central collector” in the sense of the present invention which has received the reference 69 in this prior art. Because Parmentier lacks the central collector as recited in amended claim 1, it cannot anticipate claim 1, nor any of the claims from which it depends.

5. Claim 14 Is Not Obvious In View Of Parmentier Combined With U.S. Patent No. 3,361,262 (Orr).

Orr discloses a filtration device with cells in a carousel wherein the cells do not tilt about any axis. The removal of the cake is obtained by a screw. This prior art offers consequently no teaching for solving the problem of a cell tilting about a tangential axis with simultaneously a continuous communication between the cells and the central collector distributor, without wear

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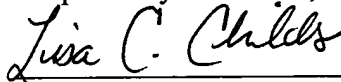
of the conduits connecting the bottom of the cell and the central collector. Moreover, Orr does not cure the deficiencies of Parmentier as described above. Thus, claim 14 should also be allowed.

6. Claim 2 Should Be Allowed

Applicant has rewritten claim 2 in independent form, and it should now be in allowable form, as indicated by the Examiner.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,



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